

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 29 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

THOMAS WRIGHT, JR.,

Defendant.

4:19CR729 SNLJ/NAB

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its Attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Allison H. Behrens, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with criminal conduct occurring on three separate occasions. On the first occasion, May 11, 2019, he is charged with possessing with the intent to distribute fentanyl and with being a felon in possession of a firearm. On the second occasion, occurring August 2, 2019, he is charged with being a felon in possession of ammunition. On the third occasion, August 23, 2019, he is charged with committing a carjacking.

2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142, that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

3. Further, while committing the carjacking on August 23, 2019, Defendant punched the two victims repeatedly, bit one of the victims on the shoulder and dragged the other victim along the ground as he drove away in the stolen vehicle. He also told the victims that he had a firearm.

4. Defendant has a substantial criminal history. In addition, he has been on probation several times and had his probation revoked due to his failure to comport with court supervision. He also has a misdemeanor escape from custody conviction.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Allison H. Behrens
ALLISON H. BEHRENS, #38482MO
Assistant United States Attorney